

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WORLD WIDE LICENSES, LTD.,
a Hong Kong corporation,

Plaintiff,

V.

POLAROID CONSUMER
ELECTRONICS, LLC f/k/a PETTERS
CONSUMER BRANDS, LLC,
a Delaware company,

Defendant.

C.A. No. 07-0096-MPT

NOTICE OF DEPOSITION OF WORLD WIDE LICENSES, LTD.

TO: The above-captioned plaintiff and its attorneys:

Matt Neiderman, Esquire
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Boston, Massachusetts 02210-2600

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Polaroid Consumer Electronics, LLC f/k/a Petters Consumer Brands, LLC (“PCE”) will take the deposition of World Wide Licenses, Ltd. (“WWL”). The deposition will be taken at the offices of Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, Delaware 19801-1494, on March 21, 2008 at 9:00 a.m. EST, continuing day-to-day thereafter until completed. The deposition will take place before an officer duly authorized to administer oaths and will be transcribed by stenographic means. Pursuant to Federal Rule of Civil Procedure 30(b)(3), you are advised that the testimony may also be recorded on videotape.

As required by Rule 30(b)(6) of the Federal Rules of Civil Procedure, WWL will designate and produce one or more officials, employees, agents, or other persons knowledgeable to testify on its behalf regarding:

1. WWL's efforts to respond to PCE's discovery requests including, but not limited to, efforts to locate and identify documents, including documents in electronic format, responsive to WWL's requests;
2. All terms of the "oral understanding" referenced in paragraph 10 of the Complaint;
3. The "course of dealing" referenced in paragraph 10 of the Complaint;
4. The terms and conditions pertinent to PCE, Polaroid Corporation or any Polaroid-related entity's purchase, return, and receipt of replacement goods from WWL;
5. The terms of all contracts, agreements and Memoranda of Understanding between WWL, PCE, Polaroid Corporation or any Polaroid-related entity;
6. The terms and conditions pursuant pertinent to the i832 Order and the Studio 4 Order;
7. The factual basis for, and calculation of, the amount WWL claims PCE owes WWL in paragraphs 17 and 19 of the Complaint;
8. The factual basis for, and calculation of, all damages claimed by WWL, including but not limited to those referenced in paragraphs 23, 32, and 47 of the Complaint and WWL's Answer to Interrogatory No. 3;
9. All documentation pertinent to PCE, Polaroid Corporation or any Polaroid-related entity's purchase, return, and receipt of replacement goods from WWL, including but not limited

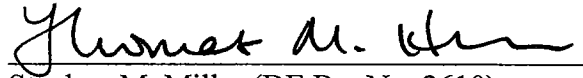
to the issuance, receipt and use of purchase orders, invoices, debit memos and notes, return to vendor notes, vendor return merchandise authorization numbers and packing slips; and

10. All allegations, as well as WWL's defenses to such allegations, that any cameras sold by WWL to PCE, Polaroid Corporation, or any Polaroid-related entity, or sold by WWL pursuant to any license agreement between WWL and Polaroid Corporation, infringed any third party's intellectual property, including but not limited to any of the following:

- a. U.S. Letters Patent No. 515,138,459 entitled "Electronic Still Video Camera With Direct Personal Computer (PC) Compatible Digital Format Output";
- b. U.S. Letters Patent No. 6,094,219 entitled "Electronic Still Video Camera With Direct Personal Computer (PC) Compatible Digital Format Output;"
- c. U.S. Letters Patent No. 6,233,010 B1 entitled "Electronic Still Video Camera With Direct Personal Computer (PC) Compatible Digital Format Output";
- d. U.S. Letters Patent No. 6,323,899 B1 entitled "Process For Use In Electronic Camera";
- e. U.S. Patent No. 6,895,449;
- f. U.S. Patent No. 6,470,399; or
- g. EP Patent No. 0 917 682.

Dated: February 11, 2008

MORRIS JAMES LLP



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